

In the Matter of )  
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Unlicensed Operation in the TV Broadcast Bands ) ET Docket No. 04-186  
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On March 30, 2007, the Federal Communications Commission (“FCC”) released a report titled “Interference Rejection Thresholds of Consumer Digital Television Receivers Available in 2005 and 2006” (OET 07TR-1003). Microtune, Inc. respectfully submits these comments in response to this report.

Fortunately, the National Telecommunications and Information Administration (NTIA) chose to implement minimum performance specifications for their coupon-eligible converter boxes (CECB) that are similar to the ATSC Recommended Guidelines. The purchase of these converter boxes will be subsidized by a \$40 NTIA coupon upon request. Those who obtain these boxes will have a digital TV receiver with good interference rejection provided that the specifications are properly enforced. The

segment of the public with low income that relies on off air broadcast can take advantage of this and be assured of quality reception.

We propose that tuners in all future digital TVs should be required to have the same minimum performance specifications as CECB. Any future mobile TV receivers should also have a minimum performance specification similar to the Mobile and Portable DVB-T Radio Access Interface Specification (MBRAI) for DVB-H. This will increase the base of receivers with good interference rejection and allow workable specifications for unlicensed devices to be established. The public will be served by getting greater use of this valuable spectrum through intelligent governance of those who share it.

Respectfully submitted,

MICROTUNE, INC.

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April 30, 2007